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Plaintiffs' Liaison Counsel

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
 ADDICTION/PERSONAL INJURY
 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

*F.S. filed on behalf of minor R.S. v. Meta
 Platforms, Inc. et al, 4:24-cv-04701;*

*A.W. on behalf of A.M. v. Meta Platforms,
 Inc. et al, 4:24-cv-06726;*

*T.P. on behalf of M.P. v. Snap Inc. et al, 4:24-
 cv-06730;*

*T.P. on behalf of L.P. v. Meta Platforms, Inc.
 et al., 4:24-cv-06731;*

*S.G., filed on behalf of minor A.G. v.
 ByteDance Inc. et al, 4:24-cv-07429;*

*L.S. individually and on behalf of S.T. v. Meta
 Platforms, Inc. et al, 4:24-cv-07630;*

*K.C. and K.B. v. Meta Platforms, Inc. et al,
 4:24-cv-07663;*

*C.J. and K.J. v. Google LLC et al, 4:24-cv-
 07664;*

S.C. and Z.C. v. Meta Platforms, Inc. et al,

**DECLARATION OF JENNIE LEE
 ANDERSON IN SUPPORT OF
 PLAINTIFFS' ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL
 EXHIBITS TO THE DECLARATION OF
 JENNIE LEE ANDERSON IN SUPPORT OF
 PLAINTIFFS' TWELFTH
 CONSOLIDATED *EX PARTE*
 APPLICATION FOR APPOINTMENT OF
 GUARDIANS *AD LITEM***

1 4:24-cv-07665;

2 *L.C. and B.C. v. TikTok, Inc. et al*, 4:24-cv-
07898;

3 *S.B. and A.S. v. TikTok, Inc. et al*, 4:24-cv-
4 07900;

5 *R.D. and B.D. v. TikTok, Inc. et al*, 4:24-cv-
07902;

6 *R.C. individually and on behalf of A.C. v.*
7 *Meta Platforms, Inc. et al*, 4:24-cv-07907;

8 *C.J., individually and on behalf of K.J. v.*
9 *Meta Platforms, Inc. et al*, 4:24-cv-07905;

10 *F.D. and S.D. v. Meta Platforms, Inc. et al*,
4:24-cv-08626;

11 *J.P. and A.B. v. Meta Platforms, Inc. et al*,
12 4:24-cv-08628;

13 *P.K. and K.K. v. Meta Platforms, Inc. et al*,
4:24-cv-08629;

14 *L.S. individually and on behalf of S.L. v.*
15 *Google LLC et al*, 4:24-cv-08639;

16 *M.P. individually and on behalf of E.P. v.*
17 *Meta Platforms, Inc. et al*, 4:24-cv-08645;

18 *S.W. and Z.T. v. Meta Platforms, Inc. et al*,
19 4:24-cv-08648;

20 *J.W. individually and on behalf of M.B. v.*
21 *Snap, Inc. et al*, 4:24-cv-08651;

22 *I.W. and E.W. v. Snap, Inc. et al*, 4:24-cv-
08653;

23 *J.T. and A.M. v. Meta Platforms, Inc. et al*,
24 4:24-cv-08670;

25 *D.C. and D.W. v. Google LLC et al*, 4:24-cv-
08686;

26 *R.C. individually and on behalf of C.R. v.*
27 *Google LLC et al*, 4:24-cv-08687;

28 *T.G. individually and on behalf of J.D. v.*
Meta Platforms, Inc. et al, 4:24-cv-08693;

H.C., by and through Amber Humphrey, 3:24-

1 cv-08732;

2 *A.O. and A.S. v. Meta Platforms, Inc. et al*,
4:24-cv-08813;

3 *D.G. and F.G. v. Meta Platforms, Inc. et al*,
4:24-cv-08817;

5 *P.L. and S.L. v. Meta Platforms, Inc. et al*,
4:24-cv-08819;

6 *F.A. and L.G. v. Meta Platforms, Inc. et al*,
7 4:24-cv-08882;

8 *HM and GM v. Meta Platforms, Inc. et al*,
4:24-cv-08884.

9 I, Jennie Lee Anderson, do hereby declare and state as follows:

10 1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted
11 to practice before the courts of the State of California and in the Northern District of California. I
12 am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent*
13 *Addiction/Personal Injury Products Litigation*, Case No. 4:22-MD-03047, and a counsel of
14 record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I
15 make this declaration of my own personal knowledge and, if called as a witness, I could and
16 would testify competently to the matters stated below.

17 2. I make this declaration in support of Plaintiffs' Administrative Motion to File
18 Under Seal Exhibits to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Twelfth
19 Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Administrative
20 Motion to Seal").

21 3. For the reasons set forth in Plaintiffs' administrative motion to seal filed on
22 February 28, 2023 (ECF No. 147) and the Administrative Motion to Seal filed herewith, Plaintiffs
23 seek to seal the Exhibits attached to the Declaration of Jennie Lee Anderson in Support of
24 Plaintiffs' Twelfth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*
25 ("Anderson Declaration").

26 4. True and correct copies of the following Exhibits to the Anderson Declaration
27 are as follows and attached hereto:
28

- 1
- 2 • *F.S. filed on behalf of minor R.S. v. Meta Platforms, Inc. et al*, 4:24-cv-04701 (Exhibit
- 3 1);
- 4 • *A.W. on behalf of A.M. v. Meta Platforms, Inc. et al*, 4:24-cv-06726 (Exhibit 2);
- 5 • *T.P. on behalf of M.P. v. Snap Inc. et al*, 4:24-cv-06730 (Exhibit 3);
- 6 • *T.P. on behalf of L.P. v. Meta Platforms, Inc. et al.*, 4:24-cv-06731 (Exhibit 4);
- 7 • *S.G., filed on behalf of minor A.G. v. ByteDance Inc. et al*, 4:24-cv-07429 (Exhibit 5);
- 8 • *L.S. individually and on behalf of S.T. v. Meta Platforms, Inc. et al*, 4:24-cv-07630
- 9 (Exhibit 6);
- 10 • *K.C. and K.B. v. Meta Platforms, Inc. et al*, 4:24-cv-07663 (Exhibit 7);
- 11 • *C.J. and K.J. v. Google LLC et al*, 4:24-cv-07664 (Exhibit 8);
- 12 • *S.C. and Z.C. v. Meta Platforms, Inc. et al*, 4:24-cv-07665 (Exhibit 9);
- 13 • *L.C. and B.C. v. TikTok, Inc. et al*, 4:24-cv-07898 (Exhibit 10);
- 14 • *S.B. and A.S. v. TikTok, Inc. et al*, 4:24-cv-07900 (Exhibit 11);
- 15 • *R.D. and B.D. v. TikTok, Inc. et al*, 4:24-cv-07902 (Exhibit 12);
- 16 • *R.C. individually and on behalf of A.C. v. Meta Platforms, Inc. et al*, 4:24-cv-07907
- 17 (Exhibit 13);
- 18 • *C.J., individually and on behalf of K.J. v. Meta Platforms, Inc. et al*, 4:24-cv-07905
- 19 (Exhibit 14);
- 20 • *F.D. and S.D. v. Meta Platforms, Inc. et al*, 4:24-cv-08626 (Exhibit 15);
- 21 • *J.P. and A.B. v. Meta Platforms, Inc. et al*, 4:24-cv-08628 (Exhibit 16);
- 22 • *P.K. and K.K. v. Meta Platforms, Inc. et al*, 4:24-cv-08629 (Exhibit 17);
- 23 • *L.S. individually and on behalf of S.L. v. Google LLC et al*, 4:24-cv-08639 (Exhibit
- 24 18);
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- 1 • *M.P. individually and on behalf of E.P. v. Meta Platforms, Inc. et al*, 4:24-cv-08645
- 2 (Exhibit 19);
- 3 • *S.W. and Z.T. v. Meta Platforms, Inc. et al*, 4:24-cv-08648 (Exhibit 20);
- 4 • *J.W. individually and on behalf of M.B. v. Snap, Inc. et al*, 4:24-cv-08651 (Exhibit 21);
- 5 • *I.W. and E.W. v. Snap, Inc. et al*, 4:24-cv-08653 (Exhibit 22);
- 6 • *J.T. and A.M. v. Meta Platforms, Inc. et al*, 4:24-cv-08670 (Exhibit 23);
- 7 • *D.C. and D.W. v. Google LLC et al*, 4:24-cv-08686 (Exhibit 24);
- 8 • *R.C. individually and on behalf of C.R. v. Google LLC et al*, 4:24-cv-08687 (Exhibit
- 9 25);
- 10 • *T.G. individually and on behalf of J.D. v. Meta Platforms, Inc. et al*, 4:24-cv-08693
- 11 (Exhibit 26);
- 12 • *H.C., by and through Amber Humphrey*, 3:24-cv-08732 (Exhibit 27);
- 13 • *A.O. and A.S. v. Meta Platforms, Inc. et al*, 4:24-cv-08813 (Exhibit 28);
- 14 • *D.G. and F.G. v. Meta Platforms, Inc. et al*, 4:24-cv-08817 (Exhibit 29);
- 15 • *P.L. and S.L. v. Meta Platforms, Inc. et al*, 4:24-cv-08819 (Exhibit 30);
- 16 • *F.A. and L.G. v. Meta Platforms, Inc. et al*, 4:24-cv-08882 (Exhibit 31);
- 17 • *HM and GM v. Meta Platforms, Inc. et al*, 4:24-cv-08884 (Exhibit 32).

22 5. Pursuant to Civil Local Rule 7-11, on June 15, 2023, Defendants agreed to a

23 standing stipulation that the individual applications seeking appointment of guardians *ad litem* in

24 this litigation may be filed under seal. Defendants also confirmed that, in so stipulating,

25 Defendants do not waive, and expressly reserve, their right to seek an order or orders in the future

26 to unseal individual applications and/or require parents who wish to proceed pseudonymously

27 going forward make a showing of good cause.

28 //

1 I declare under penalty of perjury pursuant to the laws of the United States of America that
2 the foregoing is true and correct.

3 Dated: December 23, 2024

Respectfully submitted,

4 /s/Jennie Lee Anderson
5 Jennie Lee Anderson

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12 *Plaintiffs' Liaison Counsel*
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